

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

NEW YORK LIFE INSURANCE
COMPANY,

Plaintiff,

v.

MASSIEL ORTIZ and JULIA KLAH,

Defendants.

C.A. No. 14-074/S

PLAINTIFF'S MEMORANDUM IN REPLY
TO DEFENDANT'S OBJECTION TO PLAINTIFF'S
MOTION FOR PROTECTIVE ORDER

Defendant Massiel Ortiz, who has moved to withdraw \$250,000.00 from the Registry of the Court, contends that a deposition in New York would impose an economic hardship upon her. The solution is what New York Life originally proposed to Ms. Ortiz's counsel: conduct the deposition by telephone. A telephonic deposition will be more convenient and less expensive for all parties.

Respectfully Submitted,
New York Life Insurance Company,
By its attorneys,

/s/ Brooks R. Magratten
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Dated: November 2, 2015

CERTIFICATE OF SERVICE

I certify that the within document was electronically filed with the clerk of the court on November 2, 2015, and that it is available for viewing and downloading from the Court's ECF system. Service by electronic means has been effectuated on all counsel of record.

/s/ Brooks R. Magratten